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1 the SORD order. We want it to be compared to
2 what we actually order on the LSR.

3 MR. DYSART: Do you have any idea
4 of how you would propose to do that?

5 MR. SAUDER: Well, in LSR we enter
6 in obviously very detailed information at the
7 USOC level, FID, the PICC level. And I think
8 you could just -- there's probably different
9 ways you can implement it, if it was on a
10 per-line basis or per-order basis, but I think
11 there would be a -- there should be a way that
12 it could be done, because we're entering all
13 this in. It's captured electronically, and we
14 should be able to compare what posts on that
15 order as well.

16 MR. DYSART: The problem with your
17 proposal is that I don't see any way to do it
18 other than manual. And that would be taking
19 manual -- every manual LSR and comparing it to
20 what's done in SORD or --

21 MR. SAUDER: We enter in
22 electronically following the LSOR, and that has
23 a specific field, you know, for our order. And
24 then that's put on -- the exact same information
25 is put on the SORD order. I don't -- I think we

1 changed, I don't know that there's a mechanical
2 way to do that. If there isn't a mechanical
3 way -- and we'll go back and verify. If there
4 isn't a mechanical way to do that, what it would
5 entail is taking the LSR that fell out, you'd
6 have to print a copy or whatever you do, and
7 then go through manually to do that comparison.

8 Now, obviously that's not practical on
9 every order or every LSR. So now you have the
10 issue -- it's a manual process. The only
11 practical way to do it would be some sort of
12 sampling methodology, which takes away service
13 reps from being able to process your orders. So
14 now you're really -- you're in Catch-22. Do I
15 do that to look at this issue, or do I put these
16 service reps on the line there to handle
17 requests from customers? So that's the dilemma.

18 What I will do is go back and verify
19 can we do what Birch is requesting
20 electronically. If we can, then I don't know
21 that we have a huge issue with that change. But
22 if we can't, then we've got a major problem.

23 MR. SRINIVASA: Well, let me -- if
24 more LASR edits were there, if more edits were
25 MOGable, you wouldn't have to look into this.

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1 should be able to find that there's some way to
2 do that electronically.

3 MS. DILLARD: Well, whether that's
4 MOG or service-rep typed, that information from
5 the LSR is basically generated into a service
6 order. So I'm not sure how we'd do that from a
7 mechanical standpoint.

8 MR. SRINIVASA: Well, again, what
9 he's -- my understanding is, if their
10 electronically generated orders fall out and
11 there's a manual entry into the SORD -- the LSR
12 contains all the correct information. There is
13 no error on the CLEC's part. But when you're
14 translating that, entering into the SORD, if
15 there are some errors created by Southwestern
16 Bell's service representative who types that in,
17 then there's inaccurate provisioning.

18 MR. DYSART: Well, I understand
19 his point completely. I mean, I absolutely
20 understand it. And if -- if we could generate
21 electronically -- a file electronically and be
22 able to pull that information out and then do
23 the compare electronically, I really don't think
24 we'd have a huge issue with this. But when we
25 created this measure, unless things have

1 Again, not all orders -- all edits are there.
2 Not all orders are MOGable; therefore, this
3 problem exists.

4 MR. DYSART: Well, it exists when
5 something falls out that has to be rekeyed in.
6 You're exactly right. But that doesn't help my
7 problem on PM-12 trying to come up with what
8 Birch is asking to do, if in fact I can't get an
9 electronic feed out of that system. I still get
10 back to the point where it's going to be manual.
11 And now you've got resources tied up to do this
12 function, and it would be a tedious, manual
13 function to do.

14 MR. SAUDER: When you go in to
15 determine whether you can do it electronically
16 or not, I'd just urge you to use maybe not
17 just -- if it was a per-line basis -- I know
18 every line on the LSR is entered in a separate
19 field, and that information you enter in USOCs.
20 For that line specifically, you enter in PICC
21 and LPICC for that line. I mean, maybe you
22 could do it on a per-line basis.

23 MR. DYSART: Well, we'll go back
24 and see if there's any way to pull that
25 information off electronically so that we can do

<p>1 a match against that file and then the -- 2 whatever it is that we look at on the end got 3 posted on a service order. So if we can do it 4 electronically, I don't think we have a major 5 problem with making the change.</p> <p>6 MR. SRINIVASA: In the event that 7 they're not able to do this electronic 8 comparison of what the order -- how it got 9 posted or how it was processed versus what came 10 out of LSR to keep two electronic copies and 11 make a comparison, is there a statistical 12 method, say, you -- you know, a good sample that 13 they can take and then --</p> <p>14 MR. DYSART: There's sampling 15 methodology that can be used. I mean, any good 16 statistician will have sampling methodology. 17 The only problem is, even though you have a 18 sample, you still have to have the physical 19 people to do that. And I guess you'd have to 20 weigh, is there a better use of their time, the 21 people that are actually doing the real work, 22 than creating this measurement? Is that 23 measurement worth --</p> <p>24 MR. SRINIVASA: That's from your 25 perspective. From the CLEC's perspective, the</p>	<p>Page 261</p> <p>1 That way you don't have to go through every 2 order.</p> <p>3 MR. SAUDER: We're also following 4 the same ordering process using the LSOR. I 5 think there will be some way to be able to map 6 that electronically to make the determination. 7 When you're using a guideline of how you order 8 things at the very detailed level, the same 9 detail that they put on the SORD order, you 10 should be able to -- I think that electronic 11 comparison, it should be able to be made.</p> <p>12 MR. DYSART: Well, it's easy for 13 us to sit here and say it should be, but quite 14 honestly, I'm not an LSOR expert or a LEX expert 15 or a LASR expert. So until we go back and get 16 some really detailed look at it to see if 17 there's a way to do it, it's pure speculation.</p> <p>18 MR. WAKEFIELD: Just some 19 additional information. Our orders where this 20 occurred were sent over EDI electronically. So 21 hopefully the information would be available 22 electronically to compare to the SORD order.</p> <p>23 MS. DILLARD: Well -- and this is 24 Maria Dillard -- certainly what Randy has been 25 saying is that we'll go back and see if this is</p>
<p>1 order provisioning is incorrect. They lose the 2 customer and --</p> <p>3 MR. SAUDER: We could -- we open 4 ourselves up for slamming. And, I mean, that -- 5 there's a lot of --</p> <p>6 MR. SRINIVASA: There's a lot of 7 repercussions of that. The slamming is a major 8 issue.</p> <p>9 MR. WAKEFIELD: And, Your Honor -- 10 Jason Wakefield, WorldCom -- we've had instances 11 where the customer was provisioned over to 12 another carrier, and the root cause appeared to 13 be manual error when an order fell out. So 14 we've had issues both on the LD side as well as 15 on the local side. And, again, this measure -- 16 this type of measurement would help us get our 17 arms around exactly how big the issue is and how 18 many times this type of manual error occurs.</p> <p>19 MR. DYSART: Well, again, it's the 20 same issue. I --</p> <p>21 MR. SRINIVASA: Right. Look into 22 that. See if you can electronically collect 23 that, or if it's not possible to do that 24 electronically, is there a good statistical -- 25 statistically valid method to calculate that.</p>	<p>Page 262</p> <p>1 available. I encourage all of the CLECs to 2 continue to work through their account managers, 3 because these issues I think are being 4 addressed. They're being resolved. We're 5 putting process improvements in place if any of 6 this is being identified. So, you know, I 7 understand the concern, but I can't respond to 8 any accusations. I'm not sure it's as bad as it 9 sounds right here, but certainly we're working 10 very closely with all the CLECs to resolve any 11 issues.</p> <p>12 MR. WAKEFIELD: Just to confirm, 13 yes, we are working to the account level, and I 14 certainly didn't intend to make any accusations. 15 I was saying that this issue has arisen. We are 16 working it at an account level, and it would be 17 nice to know the magnitude of the problem.</p> <p>18 MR. SRINIVASA: And, Mr. Dysart, 19 when will you let us -- get back to us whether 20 or not, you know --</p> <p>21 MR. DYSART: Well, this one is one 22 of those that I mentioned earlier that would 23 take significant work. So it may take 24 significant work even to determine whether or 25 not we could get it -- I would -- I'll try by</p>

1 the 25th to get you an answer can we do it.
2 MS. BOURIANOFF: AT&T mentioned
3 this earlier, but just to stress again, to the
4 extent that edits get moved up in the ordering
5 process, that cares for a lot of the concern
6 that CLECs have, because it prevents orders
7 falling out and -- for manual handling. And so
8 we'd like to stress --

9 MR. DYSART: Well, nobody would
10 love it more than the LSC.

11 MS. FAGAN: I believe under PM-12,
12 there was another issue. AT&T proposed
13 additional language for the business rule.

14 MS. CHAMBERS: Yes. And this is
15 Julie Chambers with AT&T. And our initial
16 proposal was similar, I think, to what Birch was
17 getting at, just in the fact that this measure,
18 as reported previously, was not capturing all of
19 the issues and concerns that we were seeing in
20 our business. That's where the clarification to
21 actually insert the USOC terminology into this
22 measure came about. Actually all that's being
23 looked at today is -- are the USOCs, and it is
24 from a SORD perspective to their -- what posts
25 on the service order.

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1 disaggregation by LEX versus EDI and by order
2 type and breaks out resale UNE-P, UNE and I
3 think all others. And that's the existing
4 business rule language that's in 1.6.
5 What Southwestern Bell has in fact
6 reported on the Web site to date, to my
7 knowledge, is only the disaggregation by LEX and
8 EDI. And -- and in fact, I think that was noted
9 by Telcordia when they went through and did
10 their supplemental Tier 1 analysis. And so we
11 would -- when it's represented down here the
12 reference to levels of disaggregation, LEX/EDI
13 versus the product, from AT&T's perspective, the
14 issue is retaining the existing business rule
15 language and actually seeing it implemented that
16 disaggregates flow-through by the mode of entry,
17 which is effectively what was captured in the
18 categories that the Commission had approved in
19 1.6.

20 MR. SRINIVASA: Resale was the
21 UNE?

22 MR. COWLISHAW: UNE-P, yeah. I
23 think those were the four categories. The exact
24 language is for CLEC-typed orders by UNE loops,
25 resale, UNE combos and others.

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1 So in clarifying that, it doesn't
2 remove our concern that there still is a gap in
3 provisioning accuracy. And actually getting at
4 the larger, you know, concern, I think
5 Southwestern Bell's agreement to look at Birch's
6 proposal will be one step in that direction.

7 MR. SRINIVASA: Again, this is a
8 parity measure, No. 12.

9 MR. DYSART: It currently is. If
10 we go to a process where we're doing a sampling
11 methodology, we may have to reexamine that.

12 MR. SRINIVASA: PM-13, order
13 process and percent flow-through.

14 MR. DYSART: PM-13, I think we've
15 pretty well documented the differences.
16 Obviously there's the levels of disaggregation
17 difference, LEX/EDI versus product. Then Birch,
18 basically a flow-through at an LSR level. So
19 those are the issues on 13. I don't know that
20 we need a lot of more detail on those. Y'all
21 may, but I'm pretty familiar with the issues.

22 MR. SRINIVASA: Levels of --
23 LEX/EDI versus product.

24 MR. COWLISHAW: The actual
25 existing business rule, 1.6, calls for

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1 MR. SRINIVASA: Do I have a
2 response from -- other than saying that this
3 is --

4 MR. DYSART: Well, yeah, I can
5 respond with our position. Our position is that
6 for these type of -- this measurement, if a CLEC
7 is a reseller and they're providing
8 flow-through, that's what they're going to see,
9 obviously. If they're providing UNE-P, the
10 flow-through rate on UNE-P is what they're going
11 to see. Or the predominance -- whatever service
12 it is that they're ordering, the predominance of
13 that will carry the weight of this measurement.

14 So to disaggregate it further, I really
15 don't see a need, because our commitment is to
16 provide equivalent flow-through to EASE. And
17 what we've done in EASE is we've -- whatever is
18 MOG-eligible plus whatever flows through EASE,
19 we've said that's the -- what -- we will use it
20 as a comparison.

21 So you're getting an overall
22 flow-through number, and that's really what's
23 important. It's not important that it's resale
24 versus UNE versus UNE-P, because if you're the
25 provider, you're going to see whatever the

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1 predominance is that you're ordering. And from
2 a Texas competition-affecting measurement, I
3 mean, it's important that -- the overall
4 flow-through, not the specific individual
5 categories, because whatever predominantly is
6 ordered is going to drive the measurement. And
7 that's our position.

8 MR. SRINIVASA: What if a CLEC
9 has, you know, entered the market using all --
10 all modes? If you're reporting the data to
11 them -- say it's 33 percent of each, 33 point
12 whatever it is, equally -- equal share of that.
13 Then, you know, some were resale, some were
14 UNE-P and some were UNE.

15 MR. DYSART: Well, if our
16 performance on that is not equivalent to the
17 EASE, then we're going to pay. And regardless
18 of whether or not it's -- you know, UNE-P is
19 really, really good, and UNE loops are really,
20 really good and resale is maybe not quite as
21 good, the overall flow-through that they're
22 seeing is the overall flow-through for what we
23 do in EASE.

24 In EASE, we don't break it out by
25 product type. So it doesn't seem to me to be --

1 whatever we had in that, if they're not
2 reporting it that way, should we take another
3 look in saying that it should be reported in
4 EASE, broken down by EASE or LEX or EDI? That's
5 one of the things that we're looking into, also.
6 I mean, should we modify the business rule?
7 Let me ask you this: When you're
8 measuring flow-through, aren't you trying to see
9 if the orders flow through certain systems?
10 EASE is one type of -- the other system that's
11 available, the OSS system, for some certain
12 CLECs to send their orders through. There's
13 LEX. That's another system that's available,
14 and then EDI. Isn't that what we're capturing
15 rather than type of entry?

16 MS. CHAMBERS: Well, Nara, I see
17 where you're going, but also the way that -- in
18 which flow-through has been implemented is based
19 on, you know, very specific ordering
20 requirements, so that certain orders will flow
21 through, perhaps for UNE loop, that -- and
22 different, you know, percentage of the UNE-P or
23 platform orders will flow through.

24 So you're comparing that against
25 Southwestern Bell's retail performance via EASE.

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1 it's just one more disaggregation. Actually,
2 it's more than one, because now you're talking
3 about those some categories for LEX and EDI. So
4 you're talking about six more disaggregations
5 you've got to do on flow-through measurement.
6 We already on some of them have 30. This
7 doesn't seem to be one that really needs more
8 levels of disaggregation.

9 MR. SRINIVASA: If it's broken
10 down that way, how could that be a parity
11 measure, then? And if it's UNE recorded as a
12 separate measure, UNE-P is a separate -- well,
13 UNE -- and then resale -- resale probably is
14 close to EASE, maybe. But what would you do for
15 the other two? Are you going to establish a
16 benchmark if it's disaggregated? I'm not saying
17 that we're going to.

18 MR. COWLISHAW: You make that
19 decision separately. What the rule has been all
20 along is that we're supposed to report it
21 separately and if it's parity with EASE. And
22 that's what we said in 1.6. It just hasn't been
23 done.

24 MR. SRINIVASA: Right. In the
25 six-month review process as part of that,

1 the system, underlying system, but it does help
2 to disaggregate based on the different, you
3 know, products or ordering capabilities, in
4 that, you know, different -- every release,
5 there are different edits that are moved forward
6 that affect orders for each of these type of
7 services in a different manner.

8 So as AT&T is entering the market using
9 multiple means of which to provide service to
10 various customer segments, it's more beneficial
11 for a CLEC to see these broken out, not only by
12 EASE, LEX and EDI, by the underlying system, but
13 also then by the actual order that you're
14 placing.

15 MR. SRINIVASA: I'll let
16 Southwestern Bell respond one more time, and
17 then I think we have enough data to make a
18 decision.

19 MS. BOURIANOFF: Well, Nara, can I
20 just add one thing to that? I mean, if the DSL
21 CLECs have routinely committed and suggested
22 that DSL, which is a specific product, you know,
23 either unique measures or measures where they
24 can track that performance -- and that's what
25 we're talking about with this measure. Yes,

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1 it's important to see on the interfaces if the 2 interfaces provide flow-through. But for 3 carriers that are using multiple modes of entry, 4 we would like from a business perspective to be 5 able to track what kind of flow-through is being 6 provided for UNE-P versus, you know, a data 7 entry versus a UNE loop entry, versus an HFC. 8 Well, not HFC. Sorry.	1 disaggregation issue. I think we have enough 2 data on that. They're saying mode of entry, and 3 you're, you know, going further down to the 4 LSR --	9 But, I mean, we're entering the market 10 in many different ways. And Southwestern Bell 11 has also responded to us -- to our request to 12 move edits up in the ordering process, that 13 that's going to have to be worked through change 14 management, we're going to have to specify what 15 edits need to be moved up. And I think for me 16 to be able to intelligently decide what edits 17 need to be moved up and make that request, we 18 need to know what kind of flow-through is being 19 provided on different types of entry products.	5 MR. SAUDER: Well, they actually 6 report -- T.J. Sauder with Birch. They actually 7 report at the SORD order level for flow-through. 8 So whenever we submit an LSR, if they have four 9 SORD orders created, which is about what 10 their -- what Birch averages, they're counting 11 four orders that flow through. We found in the 12 one month of source data that I have, that to 7 13 or 8 percent of our LSRs, some of the SORD 14 orders will flow through, and some will fall 15 out. And I feel that this performance 16 measurement doesn't adequately tell the true 17 story of what happens with this LSR. It has 18 fallen out. It has been exposed to manual 19 handling. And the errors that possibly -- I 20 mean, that's another -- or that's another 21 subject. But it doesn't truly reflect what that 22 LS -- the manual handling for that LSR.
20 MR. DYSART: I can respond to 21 that. Quite frankly, moving rejects up to LASR 22 has nothing to do with flow-through, because if 23 we return it manually via LASR GUI, it's not 24 included in there anyway. So I don't see that 25 that is a determining factor of flow-through,	23 MR. SRINTVASA: Orders that fall 24 out for manual handling that are worked by 25 Southwestern Bell and not rejected back to CLEC		
1 because rejects are excluded from flow-through. 2 So it's still -- if you're 3 predominantly entering the market under UNE-P, 4 you're going to see your flow-through rate for 5 UNE-P. If you're predominantly a reseller, 6 you're going to do that.	1 due to CLEC-caused errors will be included as 2 failed pass-through.	Page 274	1 due to CLEC-caused errors will be included as 2 failed pass-through.
7 Quite frankly, I just don't see that it 8 adds a lot, except in more disaggregation and 9 more performance measurements that we have to do 10 with little or no value to judging Southwestern 11 Bell's performance on flow-through.	3 MR. SAUDER: That is at the 4 service order level, not at the LSR level.	3 MR. SAUDER: That is at the 4 service order level, not at the LSR level.	3 MR. SAUDER: That is at the 4 service order level, not at the LSR level.
12 MR. SRINTVASA: That's on Bullet 13 Point 1, Levels of Disaggregation. I think we 14 have enough information on that.	5 MR. DYSART: Well, if the LSR 6 creates multiple service orders and one of those 7 service orders doesn't flow through, that falls 8 out, and it's counted in this performance 9 measurement.	5 MR. DYSART: Well, if the LSR 6 creates multiple service orders and one of those 7 service orders doesn't flow through, that falls 8 out, and it's counted in this performance 9 measurement.	5 MR. DYSART: Well, if the LSR 6 creates multiple service orders and one of those 7 service orders doesn't flow through, that falls 8 out, and it's counted in this performance 9 measurement.
15 MS. EMCH: This is Marcia with 16 WorldCom. I'm not sure if the other issues are 17 captured. And under Levels of Disaggregation, 18 it's LEX, slash, EDI as a combined --	10 MR. SAUDER: But in that case, if 11 there's -- in a general case with straight 12 conversion, there's three orders. One falls 13 out. The LSC rep forgets to type in the related 14 service order field. It goes through the 15 system, and it takes our customer out of 16 service, but yet this flow-through performance 17 measurement shows a 66 percent -- 66 percent on 18 those three orders, where that LSR has fallen 19 out for manual handling, and it was -- you know, 20 there was -- human intervention was introduced 21 to that LSR.	10 MR. SAUDER: But in that case, if 11 there's -- in a general case with straight 12 conversion, there's three orders. One falls 13 out. The LSC rep forgets to type in the related 14 service order field. It goes through the 15 system, and it takes our customer out of 16 service, but yet this flow-through performance 17 measurement shows a 66 percent -- 66 percent on 18 those three orders, where that LSR has fallen 19 out for manual handling, and it was -- you know, 20 there was -- human intervention was introduced 21 to that LSR.	10 MR. SAUDER: But in that case, if 11 there's -- in a general case with straight 12 conversion, there's three orders. One falls 13 out. The LSC rep forgets to type in the related 14 service order field. It goes through the 15 system, and it takes our customer out of 16 service, but yet this flow-through performance 17 measurement shows a 66 percent -- 66 percent on 18 those three orders, where that LSR has fallen 19 out for manual handling, and it was -- you know, 20 there was -- human intervention was introduced 21 to that LSR.
19 MR. DYSART: We'll do it 20 separately. That's a misprint.	22 MS. DILLARD: From the LSR 23 perspective and in relation to the orders, it's 24 the same thing that we're measuring for the 25 CLECs as we do for retail. If there's more than	22 MS. DILLARD: From the LSR 23 perspective and in relation to the orders, it's 24 the same thing that we're measuring for the 25 CLECs as we do for retail. If there's more than	22 MS. DILLARD: From the LSR 23 perspective and in relation to the orders, it's 24 the same thing that we're measuring for the 25 CLECs as we do for retail. If there's more than

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1 one order associated with that product or
2 installing that service, they're counting more
3 than one on the EASE side and they're counting
4 more than one on the CLEC side. We have no
5 capability of doing this at the LSR level. It's
6 at the order level that we're able to track it
7 and flow it through.

8 MR. SAUDER: It's the fact that
9 for LSRs, there's obviously more service orders
10 created than on -- compared to the retail order.

11 MS. DILLARD: But, again, you're
12 taking the orders, if one of those orders falls
13 out, then it's not flowing through. Now, to
14 your point of, you know, if there's a problem
15 and it's mismanually handled and there's a
16 problem on the back end, we're taking a hit on
17 another measure on that as well. So we take the
18 hit on the flow-through on that particular
19 order, and we take it on another measure, for
20 example.

21 Flow-through has always been defined,
22 even with the FCC, that it is those orders that
23 are MOG-eligible or related to EASE that flow
24 through the systems.

25 MR. SAUDER: And I'm thinking

1 shouldn't -- there isn't a parity comparison,
2 because they go through different systems to
3 flow through.

4 MR. SRINIVASA: So this should be
5 a benchmark rather than parity? Is that what
6 you're proposing, if it goes through --

7 MR. DYSART: Well, I mean, I don't
8 know -- my memory isn't great, but I'm not so
9 sure that we didn't make that a long time ago
10 and lost that one. And I don't know that the
11 FCC sees it exactly the same way. They believe
12 flow-through is flow-through. So I'm not so
13 sure that we're going to get a lot of help in
14 that direction.

15 But, I mean, our position is fairly
16 simple, that it's through order distribution,
17 and we distribute orders, not LSRs. And that's
18 the way we've captured this measurement, and we
19 think that's the appropriate way.

20 MR. SAUDER: By the same token, we
21 submit LSRs and not service orders. So we think
22 it should be reported at the level that we
23 submit.

24 MR. SRINIVASA: I think we have
25 had enough information on this PM. I think we

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1 that -- and that FCC that you're referring to
2 was, like, a specific performance measurement,
3 wasn't it, defining all flow-through ever -- I
4 mean, it's not specific to all -- to all
5 flow-through. I think there's -- they were
6 depicting a certain performance measurement and
7 then -- in a different proceeding.

8 So, you know, I'd -- it's Birch's
9 feeling that this should be reported at the LSR
10 level and that -- you know, basically we submit
11 LSRs. We receive FOCS and SOCS back to that
12 LSR. When it gets to the other side, when you
13 split it into however many service orders, we
14 don't feel that that's -- in a perfect world, it
15 wouldn't be any of our business, because it
16 would always work every time. But as our past
17 experience in this shows, that's not the case,
18 and we think this performance measurement should
19 reflect that, the flow-through of our LSRs which
20 we submit.

21 MS. DILLARD: Again, we lose
22 parity if we move from orders to LSRs. We don't
23 have --

24 MR. SAUDER: There's also -- you
25 could probably make the argument that there

1 can move on.

2 MR. SIEGEL: I just want to
3 clarify one thing on the second bullet, which
4 related to the ASI comparison. And I just
5 wanted the Commission to understand that that
6 proposal actually came from the benchmark up.
7 It wasn't really that, oh, we -- for that
8 particular one, that we wanted to disaggregate.
9 DSL was really looking at the benchmark's
10 parity. But we aren't competing with Bell
11 Retail. We're competing with ASI. So now, how
12 do we measure parity with ASI? And just to
13 understand the genesis of that proposal.

14 MR. DYSART: And quickly, the
15 response to that is that I think inherently the
16 way the measurement is designed, that's what
17 you're going to get, because we'll provide you
18 with the Southwestern Bell affiliate, and if
19 you're doing DSL, you're, by the nature of it,
20 going to get that same -- that's what it will
21 be.

22 So if we want to call it 13 dot
23 whatever and just for DSL CLECs and they're the
24 only ones that have the Southwestern Bell
25 affiliate measure, that's probably okay or do it

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1 some way -- put the wording in the benchmark as
2 such. But inherently you're going to get it
3 that way anyway.

4 MR. SRINIVASA: In the report
5 structure, are you going to add Southwestern
6 Bell affiliate, then, also for PM-13?

7 MR. DYSART: Yeah.

8 MR. SIEGEL: I guess I would
9 assume -- and I think it probably was stated in
10 13 -- 13.2. I was just -- I guess maybe it's in
11 the lower level document where you describe how
12 you calculate what you're comparing it to, or
13 you'll say it's being compared to the
14 performance received by ASI as opposed to the
15 EASE comparison. So that -- I don't know if
16 that needs to be here.

17 MR. DYSART: Yeah. We'll have to
18 work on some -- how to get it in there. It's
19 not a problem for just, like, you guys, but if
20 someone else starts doing both, then we could
21 have an issue of how we do this.

22 MR. SRINTVASA: 13.1, total order
23 process percent flow-through.

24 MR. DYSART: This was Southwestern
25 Bell's counterproposal to the AT&T proposal.

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1 a -- perhaps a premise CRIS mismatch, and that
2 Southwestern Bell is going to go ahead and work
3 in that reject back to the CLEC. Could you just
4 clarify, is that -- how that is captured in
5 flow-through?

6 MR. DYSART: Well, it -- I don't
7 know. Let me try it in general, and if it
8 doesn't answer your question, then I might not
9 even know the answer. If we don't reject the
10 order, it will count against us in flow-through.

11 MS. CHAMBERS: Okay. And why in
12 13.1 has the exclusion about jeopardies been
13 added? That doesn't make sense, in that through
14 SORD is only once the FOC has been sent.

15 MR. DYSART: Yeah. That's -- that
16 shouldn't be in there. I'll delete that out.

17 MR. SRINTVASA: What AT&T proposed
18 is not clear in this joint --

19 MR. COWLISHAW: This isn't a joint
20 document.

21 MR. DYSART: Well, I'd take a
22 little bit exception with that. It was
23 attempted to be a joint. Now, we've left out a
24 couple things, but it -- and probably in here.
25 So I just want that on the record.

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1 Basically I believe they wanted it down through
2 posting, as I recall. And what we came back
3 with, we would do total order process percent
4 flow-through, not -- it has nothing to do with
5 MOG-eligible, just all orders received
6 electronically and look at that flow-through
7 rate on a diagnostic basis.

8 MS. CHAMBERS: Julie Chambers with
9 AT&T. I mean, I think our preference would
10 still be that we really get a picture of
11 flow-through on an end-to-end basis, which would
12 be through posting. And with that said, I mean,
13 I think our proposed measure would be the one
14 that would -- would adequately work in that
15 instance.

16 I do have some questions just about
17 Southwestern Bell's proposal just to help
18 clarify in the case that that is, you know,
19 what's ended up. On the business rules, if you
20 look back at 13.1 -- I mean, I'm sorry, Randy.
21 At 13, the new clarification about orders that
22 fall out for manual handling -- and I guess
23 maybe I see the language now, but one of the
24 things that we've talked about in the -- at the
25 past meetings was those instances where you have

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1 MS. CHAMBERS: It's just
2 convenient that it's 13.1. No. I'm kidding.
3 MR. COWLISHAW: No. I think what
4 happened here is you made a counterproposal to
5 the 13.1. It's not an agreed, and the 13.1, I
6 think that Julie said would still be our
7 preference, is the one that was in the original
8 matrix.

9 MS. DILLARD: And we've discussed
10 this before, but for the most part, anything
11 past the distribution, I mean, the flow-through,
12 if you will, definition, is through
13 distribution. That's been what has been
14 approved by the FCC. And the rest of this on
15 flowing down through the systems is what is
16 measured in other measures, for the most part.
17 We have a SOC measure. We have a FOC measure.
18 And now we have a (inaudible) measure.

19 So all of these down through, including
20 billing completeness -- all of the rest of this
21 process, we've attempted to put measures on each
22 piece of it. So that's the reason that we
23 thought making this counterproposal would be
24 appropriate.

25 MS. CHAMBERS: And this is Julie

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1 Chambers with AT&T. And I'll let others
2 comment, but that was the position that was
3 taken on Measure 13. I think what is proposed
4 in 13.1 is to get at, rather, all those
5 instances where manual handling impacts a CLEC's
6 orders and affects the end result to the
7 end-user customer.

8 So 13.1 was designed, once again, to
9 get a -- our proposed 13.1 was designed to get a
10 comprehensive end-to-end look at manual
11 capabilities within Southwestern Bell.

12 MR. WAKEFIELD: Jason Wakefield on
13 behalf of WorldCom. I would point out that
14 there was a comment that other measurements
15 measure the rest of the process. There is one
16 part that clearly is a metric, and we'll address
17 that in 17.1. And that is posting. So other
18 measurements don't -- don't have to --

19 MS. DILLARD: Well, again, the
20 rest of the measures, whether it's FOC, SOC,
21 jeopardy, even posting and billing completeness
22 to the posting to the bill, if not a hundred
23 percent, obviously it has fallen out for manual
24 handling in some instance. So it is being
25 measured in every other measure that we have

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1 since we've broken out the process.
2 MR. SAUDER: T.J. Sauder for
3 Birch. It's not directly being measured. It's
4 being measured if -- in 17 dot -- or 17, for
5 instance, only if it doesn't post before a bill
6 date. That may be 30 days out. So it could be
7 a 30-day interval. So that's not really
8 measuring every single instance of that.

9 I think what the CLECs are trying to
10 get at is how many of our orders are being
11 manually handled, not the performance of that
12 manual handling, but how many are actually being
13 touched.

14 MS. DILLARD: And this measure
15 does that. If it -- if it --

16 MR. SAUDER: Not on the posting
17 side.

18 MS. DILLARD: -- doesn't
19 completely pass distribution, then you know all
20 the rest of those have been manually --

21 MR. SAUDER: There's another
22 instance where manual handling can be introduced
23 and affect the CLEC, and that is on the back end
24 when it's posting, when they error out in the
25 billing system and fall out to the LSC for

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1 manual handling.
2 MR. SRINIVASA: Is that captured
3 under billing -- another billing measure?
4 MS. DILLARD: Under billing
5 completeness if the order does not post by the
6 bill cycle -- understand, they have a -- the
7 CLECs have proposed a different measurement in
8 17.1. But for the most part, if we're missing
9 the benchmark, obviously it has been touched
10 manually. And for all these measures, FOC, SOC,
11 if we're missing the benchmark, that tells you
12 that that is not being flowed all the way
13 through, if you will.

14 MR. WAKEFIELD: Jason Wakefield on
15 behalf of WorldCom. And we may be getting into
16 the 17.1 discussion, so I won't get all that
17 much into it. But an example would be if an
18 order was manually handled and it took ten days
19 to post, it wouldn't be captured in 13.1, and it
20 wouldn't be captured in 17. So that's an
21 example of one that wouldn't be captured.

22 MR. SAUDER: And what I think
23 we're trying to get at in 13.1 is see how many
24 orders are actually touched manually, not the
25 time frame it takes or the performance on that

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1 manual handling, but how many orders actually do
2 not flow through their systems if they have to
3 manually do work on it.

4 MR. SRINIVASA: It is all the way
5 up to posting. That's what you're --
6 MR. SAUDER: Right. Well,
7 there's --

8 MS. CHAMBERS: There is a portion
9 in between once the service orders are created
10 and then even what you're measuring posting
11 where orders fall out, you know, from other
12 edits back in edits within SORD or whatever
13 reasons within SORD. And I can't remember some
14 previous discussions that we've had to give the
15 exact terminology in Southwestern Bell's
16 systems, but it's definitely -- I mean, there is
17 manual touching of the orders, not just in
18 posting the orders to the billing system, but by
19 the time the service orders are created and
20 through to posting.

21 MR. DYSART: This is Randy Dysart
22 again with Southwestern Bell. It disturbs me a
23 little bit the reason for the measures that
24 we're talking about. These measures are to
25 measure our performance. It's not to measure

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1 whether it falls out for manual handling,
2 necessarily, particularly after it gets to the
3 definition of the flow-through that the -- that
4 was in the NPRM by the FCC a couple years ago
5 which talked about up and to the distribution
6 through our order distribution system.

7 So, I mean, that's what we measure
8 today. Whether it falls out after that point
9 and we correct it and get it -- and it flows
10 through and you meet your due date, quite
11 frankly is not a huge -- should not be a huge
12 concern to the CLECs.

13 What should be a concern to the CLECs
14 is if for some reason we miss a due date,
15 whether that happened because it fell out for
16 manual handling or not, a missed due date is a
17 missed due date. So you've got a performance
18 measurement that measures that. Just because
19 there's manual handling does not inherently make
20 it bad. And that's what -- a reason to measure
21 through posting or completion, just to see how
22 many manual things happen in our process. It
23 happens the same for retail. That's not a good
24 reason to have a measurement that goes all the
25 way down to that point.

1 frankly. It's performance, from our
2 performance. If we handled it manually and did
3 it correctly and got the due date that you
4 wanted and the customer was installed
5 appropriately, we didn't have to go back on the
6 repeat report, what difference does it make to a
7 CLEC whether that was handled manually or nobody
8 touched it at all?

9 MR. SAUDER: Well, in the instance
10 of posting on the back end, that's not currently
11 caught in this measurement. If they cancel
12 orders or for some reason before something
13 closed, it has a lot of effect on the CLEC and
14 the upkeep of the records of the customers.

15 MR. DYSART: And we have a
16 discussion coming up in billing on PM-17.1 that
17 y'all proposed that talks about billing --

18 MR. SAUDER: But that doesn't tell
19 us how often it happens.

20 MR. SRINIVASA: Let me ask this.
21 Bell Atlantic, when the FCC was evaluating the
22 flow-through, if it fell out manually corrected
23 and an order passed through, it was counted as a
24 passed flow-through. Wasn't that the analysis
25 of the FCC in approving Bell Atlantic?

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1 MR. SAUDER: So are you saying
2 that 13 doesn't provide valuable information
3 because it's not specifically measuring
4 performance?

5 MR. DYSART: No. I absolutely did
6 not say that. It measures exactly what was
7 defined in the NPRM by the FCC two years ago.
8 That's the definition of flow-through. What
9 flows -- what happens after that --

10 MR. SAUDER: But is it a
11 performance measurement definition of a specific
12 performance measurement that they're talking to?

13 MR. DYSART: They're talking about
14 flow-through, which is a specific performance
15 measurement, correct. I thought that's what we
16 were talking about, flow-through. But you want
17 to know how many times we touch an order
18 manually after flow-through, and the FCC wanted
19 flow-through. I'm not so sure that that
20 matters --

21 MR. SAUDER: What we're trying to
22 measure is how many times within your OSS that
23 an order is manually handled.

24 MR. DYSART: But I don't think
25 that's a valid reason for a measurement, quite

1 MR. SAUDER: In that specific --
2 MS. CHAMBERS: I think this was
3 proposed as a diagnostic measure, due to the
4 fact that, I mean, it has been a concern even
5 raised by the Commissioners in the past about
6 manual handling of CLEC orders. So it's a
7 proposal that we think would give some insight
8 into really what are the impacts. And I don't
9 know that those are clear; and, therefore, it
10 was different than the original 13.0
11 flow-through measure.

12 In just looking at the measure that
13 Southwestern Bell proposed, you know, this
14 measure would capture more than what the current
15 13.0 captures, in that it would look at all
16 orders regardless of MOG eligibility or nonMOG
17 eligibility. And therefore, perhaps -- you
18 know, I don't know if Southwestern Bell would be
19 willing to put this one as the Tier 1 and Tier
20 2 -- you know, take the damages from 13.0 and
21 apply them to 13.1 rather than making this
22 diagnostic.

23 MS. BOURIANOFF: And just to
24 clarify that, I mean, this is actually not
25 trying to just add a measure, but we have the

<p>1 debate about whether flow-throughs should 2 measure all the way through posting. That 3 debate aside, the way 13.1 is written, AT&T 4 would be willing to replace -- and this is just 5 AT&T -- replace 13.1 -- replace 13 with 13.1 if 6 the penalties applied to Measure 13.1.</p> <p>7 MR. SRINIVASA: 13.1 as proposed 8 by Bell or as proposed by you?</p> <p>9 MS. BOURIANOFF: Well, we have the 10 debate about posting, which isn't going to be -- 11 we're not going to agree about whether it should 12 be measured to posting or not. But we think 13 13.1 is broader and looks at a broader universe 14 than 13. And so being sensitive to the concerns 15 about Southwestern Bell not wanting to just keep 16 adding measures, AT&T would be amenable to 17 replacing 13 with 13.1 if the penalties applied 18 to 13.1.</p> <p>19 MR. SRINIVASA: Well, it still 20 doesn't -- but in Bell Atlantic case, if the 21 orders didn't -- fell out, it was not MOGable -- 22 whatever it is there, and if they were manually 23 entering the order, if the order passed through, 24 it's counted as a passed flow-through. That was 25 the analysis the FCC came up with.</p>	<p>Page 293</p> <p>1 yeah. Go ahead. 2 MR. DYSART: So if you wanted to 3 do that, I would consider it after we collect 4 data over a period of time, like, six months. 5 And at that point, I think we would have some 6 history to see if we could switch to this one 7 versus 13. I mean, I would be willing to look 8 at that, but I can't give -- I can't agree to 9 that today.</p> <p>10 MS. BOURIANOFF: I mean, that's 11 fine. There's no tricks involved here. We 12 really were looking at 13 and 13.1 and saying to 13 some extent they're duplicative. You don't want 14 to report more measures. You keep saying -- we 15 were trying to be sensitive to that.</p> <p>16 MR. DYSART: Well, I appreciate 17 that. But I also don't want to get myself into 18 a bind in agreeing to a parity measurement or 19 agreeing to some benchmark that I don't even 20 know we can meet.</p> <p>21 MR. SRINIVASA: So you will 22 collect data, 13. -- 13.1, as proposed by you 23 for six months, and then we'll find out should 24 there be a benchmark or how --</p> <p>25 MR. DYSART: I'm fine with that.</p>
<p>1 MR. COWLISHAW: I think the point 2 here is not trying to address this -- a narrow 3 271 compliance issue, but actually trying to 4 look at this as a six-month performance measures 5 workshop, and Southwestern Bell put a proposal 6 on the table of its 13.1. That's broader 7 than -- than the existing 13.0. And I think all 8 we're saying is that if 13.1 were going to be 9 adopted and it had the penalties attached to it, 10 it could displace 13.0. There wouldn't be a 11 need to report both of them.</p> <p>12 There's a separate issue aside that 13 you'll decide about whether there ought to be a 14 measure that goes through to posting, but even 15 taking 13.1 as Southwestern Bell has proposed 16 it, we're just making the observation that it 17 could displace 13.</p> <p>18 MR. DYSART: Well, the only 19 problem with that is, you know, currently 13 is 20 parity. There's not going to be parity. We 21 know that right off the bat, because everything 22 that you submit is not MOG-eligible, nor does it 23 flow through EASE. So there's no parity 24 comparison at that point. And so --</p> <p>25 MR. SRINIVASA: That's why --</p>	<p>Page 294</p> <p>1 MS. EMCH: WorldCom would ask that 2 LEX and EDI were separated, then. 3 MR. DYSART: Yes. 4 MS. EMCH: Thank you. 5 MR. SRINIVASA: Okay. Okay. 6 That's the end of the OSS PMS. We've still got 7 billing, trunking and change management. Those 8 were scheduled to be taken up today. 9 MR. DYSART: We've got the change 10 management person here, if we want to talk about 11 change management real quick, if we can do it 12 real quick. 13 MR. SRINIVASA: Okay. Let's see. 14 How about billing? 15 MS. BOURIANOFF: I don't think -- 16 I don't think billing will be quick. 17 MR. COWLISHAW: I think the 18 Thursday list is short, actually. The Thursday 19 list is the 21 -- 20 through 26 and LNP and -- 20 MR. DYSART: Those should be 21 short. Maybe we could move -- 22 MR. COWLISHAW: Put billing and 23 trunking there. 24 MR. DYSART: We might have to have 25 our trunking folks call in California. I don't</p>

<p>1 know if we can get --</p> <p>2 UNIDENTIFIED SPEAKER: When is it</p> <p>3 scheduled?</p> <p>4 MS. FAGAN: Let's go off the</p> <p>5 record for just a second, and we'll discuss</p> <p>6 this.</p> <p>7 (Discussion off the record)</p> <p>8 MR. SRINIVASA: Let's go ahead and</p> <p>9 get started. It's late in the evening. We need</p> <p>10 to finish up.</p> <p>11 MS. FAGAN: Then the next items</p> <p>12 are proposed performance measurements relating</p> <p>13 to change management. Why don't we start</p> <p>14 with -- we're going to start with AT&T's</p> <p>15 proposed -- proposed PM-122. Does everybody</p> <p>16 have a copy of that? Has Southwestern Bell</p> <p>17 reviewed the reports?</p> <p>18 UNIDENTIFIED SPEAKER: Yes.</p> <p>19 MS. FETTIG: Do you want me to --</p> <p>20 this is Eva Fettig from AT&T. Do you want me to</p> <p>21 just restate the rule and explain what our</p> <p>22 proposal is, or did you want to just react to</p> <p>23 it?</p> <p>24 MS. FAGAN: Why don't you</p> <p>25 succinctly rephrase it.</p>	<p>Page 297</p> <p>1 under the change management meetings that you</p> <p>2 have, there are remedies?</p> <p>3 MS. KING: Well, there is a</p> <p>4 section in the change management process that</p> <p>5 deals with abuses or -- enforcement of the</p> <p>6 change management process.</p> <p>7 MS. EMCH: You mean financial</p> <p>8 remedies?</p> <p>9 MS. KING: No.</p> <p>10 MS. EMCH: Okay. I just need that</p> <p>11 clarification.</p> <p>12 MS. BOURIANOFF: And Kathy, just</p> <p>13 to clarify, you're talking about a procedure</p> <p>14 where CLECs can seek some sort of litigation or</p> <p>15 civil remedy to enforce the change management</p> <p>16 process?</p> <p>17 MS. KING: Right. I think really</p> <p>18 we've tried to keep change management, maybe not</p> <p>19 successfully, at an operational level. And what</p> <p>20 we say -- we meet monthly. We talk about the --</p> <p>21 what's going on. If there's been any complaints</p> <p>22 about how we've managed the change management</p> <p>23 process, those are addressed there. In fact,</p> <p>24 it's a standing item on the agenda, the</p> <p>25 effectiveness of change management. And so we</p>
<p>1 MS. FETTIG: Okay. Well, the</p> <p>2 title is Percent of Timely and Compliant Change</p> <p>3 Management Notices, and I guess the spirit of</p> <p>4 this is that we would on a 12-month rolling</p> <p>5 average basis be tracking SWBT's performance as</p> <p>6 it complies with the change management process.</p> <p>7 And so from my perspective, this is something</p> <p>8 that's missing from today's measures, and that</p> <p>9 AT&T believes that SWBT should be held</p> <p>10 responsible for.</p> <p>11 MS. FAGAN: Southwestern Bell?</p> <p>12 MS. KING: This is Kathy King, and</p> <p>13 I guess I'd like to go on record as saying,</p> <p>14 first and foremost, I don't think a performance</p> <p>15 measurement on change management is necessary.</p> <p>16 We've spent a lot of time with the drafting team</p> <p>17 building safeguards into this process, and we</p> <p>18 have a section in the change management process</p> <p>19 which addresses abuses of the change management</p> <p>20 process and provides remedies to that effect.</p> <p>21 That said, as far as what the AT&T</p> <p>22 proposal is, I have a couple of questions.</p> <p>23 First of all --</p> <p>24 MS. EMCH: This is Marcia with</p> <p>25 WorldCom. Can you just repeat -- you said that</p>	<p>Page 298</p> <p>1 work it that way.</p> <p>2 And I don't really think -- I mean,</p> <p>3 what we're looking to measure here is do we meet</p> <p>4 the dates to get change management notifications</p> <p>5 out for releases, initial requirements and final</p> <p>6 requirements. And I don't think that we've ever</p> <p>7 had a problem in that area.</p> <p>8 And so that's what I was saying, is I</p> <p>9 don't think that's -- from that perspective, I</p> <p>10 don't see where this is necessary. But I did</p> <p>11 want some clarification, since you've proposed</p> <p>12 this. Are you proposing that we track</p> <p>13 notifications on every single interface, or as</p> <p>14 the MCI one said, I think they had limited it to</p> <p>15 EDI, LEX and the app-to-app for pre-order and</p> <p>16 VERIGATE. Because, you know, there's a host of</p> <p>17 other interfaces out there, and you could spend</p> <p>18 an awful lot of time counting letters, when I</p> <p>19 don't think that there's a problem.</p> <p>20 MS. BOURIANOFF: I think the</p> <p>21 business rule we suggested is EDI/LEX or EDI by</p> <p>22 DataGate and VERIGATE and pre-order release</p> <p>23 notices.</p> <p>24 MS. FAGAN: So it will be</p> <p>25 disaggregated in two levels.</p>

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1 MS. KING: The other suggestion I
2 would make to AT&T's proposal is really on the
3 second page where they talk about documentation
4 that's not accurate or complete. Rather than
5 use the language that's in there, I would just
6 refer them to what we are agreeing to provide in
7 the change management process, because some of
8 this stuff came from an old -- an old version of
9 the change management document which we're
10 currently working on. So just to make it more
11 accurate.

12 The other thing that I wanted to bring
13 up is the benchmark has been set at 98 percent
14 compliant notice to send on time. And it looks
15 like a lot of this stuff is coming from what
16 Bell Atlantic has agreed to do. And I just
17 wanted to make a point -- a couple points here
18 with regard to what we're measuring -- or what
19 is being measured in Bell Atlantic versus what
20 you're asking us to be measured on.

21 First of all, the benchmark in Bell
22 Atlantic is 95 percent, not 98 percent. And
23 second, which I find even more significant, is
24 that our notification period for application-to-
25 application changes, that is where both sides

1 the same notification.

2 MS. EMCH: This is Marsha Emch
3 with WorldCom. A question. Earlier in your
4 talking, you said that MCI had a level of
5 disaggregation, and you went on to announce some
6 GUI app-to-app. I'm not sure which ones you-all
7 said. I'm just trying to find out -- because I
8 don't know where that came from, I'd like to
9 know --

10 MS. KING: Oh, I was looking at
11 the proposal that's in the back of this
12 document.

13 MS. EMCH: I'm looking at that,
14 too.

15 MS. KING: Doesn't it say that in
16 there?

17 MS. FETTIG: It's on the AT&T one.
18 It's on the second page.

19 MS. KING: Oh, I'm sorry. Maybe I
20 mixed the two up.

21 MS. EMCH: That's fine. If you
22 misidentified the company. That was just news
23 to me, so I just wanted to know why you said
24 that.

25 MS. KING: If I had additional

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1 need to make changes to their interface. We
2 provide a minimum of 152 days from the time the
3 initial requirements come out until we implement
4 it. 30 days of that toward the end there are
5 for testing. We provide walk-throughs of the
6 initial requirements and final requirements of
7 any changes that have been made. So we're
8 talking a minimum of 152 days.

9 When I look at what Bell Atlantic's
10 notification is, for an LSOG-type industry
11 standard change, they're providing 66 days'
12 notification. I'm providing almost three times
13 that amount. And they're being held to a 95
14 percent benchmark, and I'm being held to 98.

15 Now, I can see if you're only being
16 given 66 days' notification of software changes,
17 if your letter is a day late, it's going to have
18 a big impact on you. If I'm providing it to you
19 152 days in advance, that impact has got to be
20 quite a bit less.

21 So I'm not sure that we're comparing --
22 if we're borrowing something from Bell Atlantic
23 and overlaying it, I think we really needed to
24 look more closely at what we're being measured
25 on, because it's not the same process. It's not

1 information that you didn't have?

2 MS. EMCH: Yeah. I'd like to know
3 where you got that. And the second point I was
4 going to make, at least from MCI WorldCom's
5 point of view -- I don't want to speak for
6 AT&T -- we're offering this performance
7 measurement as a proposal, as a draft that we're
8 willing to work with Southwestern Bell on. We
9 used Bell Atlantic New York's as a guideline,
10 because that's where our other retail experience
11 is. That's where there's a change management.
12 We're certainly working -- you know, willing to
13 work with Southwestern Bell, whatever the
14 intervals are going to be, you know, 98 percent,
15 95 percent, if the intervals are longer. I just
16 want to say that we're willing to work with them
17 on that so we're not trying to say, no, you have
18 to use what New York has. We're just concerned
19 that the process -- whatever is agreed to in
20 these monthly meetings, we just want to make
21 sure that whatever is agreed to is adhered to.

22 MS. BOURIANOFF: And AT&T would
23 agree with the statement by MCI WorldCom, that
24 we'd be willing to work with Southwestern Bell
25 to arrive at a change management measure. And

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1 just to respond to one other point you made, you
2 talked about the 150-day plus notice period that
3 we have here in Texas under the SBC change
4 management process. We would love it if that
5 indeed were the case, and the reason we are
6 proposing this performance measure is because
7 routinely -- fairly routinely, unfortunately,
8 CLECs are not provided with that entire notice
9 period.

10 And I just noticed that as recently as
11 yesterday, Southwestern Bell issued an
12 Accessible letter announcing concerns with
13 implementation of versioning with the July 22nd
14 release and announcing either that they wouldn't
15 have their own internal testing completed in
16 time for that release to go forward and
17 suggesting that maybe a three-week delay would
18 be appropriate.

19 And so, you know, although there might
20 be differences in the notice period as written
21 in the change management documents between SBC
22 and Bell Atlantic, the way they're implemented
23 might not be that different, which is why we
24 think a measure is very crucial.

25 MS. KING: Well, let me address

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1 been planned, because we have at least a
2 six-month lead time to get ready. And if we're
3 not given a six-month lead time, we obviously
4 can't meet the notification deadlines, as we've
5 all agreed to do in change management.

6 So it's going to have to be a
7 partnership on both -- actually, on the part of
8 regulatory bodies, CLECs and SBC to meet change
9 management notification time lines. We don't
10 totally control that.

11 MS. BOURIANOFF: Well, Kathy, in
12 response to your statement that the measures
13 drafted by AT&T would not address or capture the
14 June 5th notice that I was referring to, AT&T's
15 intent was definitely that that kind of
16 situation be captured, and the language that we
17 proposed talked about measuring not just initial
18 release notices but also initial and final
19 requirements and documentation ensuring --
20 defining CLEC comment time periods and
21 prescribed testing intervals. So it was indeed
22 our intent that this measure capture that kind
23 of situation.

24 AT&T would dispute the characterization
25 that the reason Southwestern Bell hasn't been

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1 that, because I don't think that's an entirely
2 fair statement. First of all, the specific
3 example that you gave had to do with a delay in
4 a release, which would not be covered by this
5 measurement. There is no -- there is no letter
6 notification saying if we're going to delay the
7 release, it has to be 30 days or 150 days. It's
8 notification.

9 And second, you said you would love it
10 if we could adhere to the change management
11 guidelines. And I'd have to echo that. I would
12 love it, too. We haven't had a chance to do
13 that for the releases in 2000 this year, because
14 of the mandated deadlines that we were given by
15 regulatory bodies. And these mandates were on
16 initiatives -- initiated by CLECs. Primarily
17 line sharing is what threw our schedule out.

18 So, you know, we're talking about this
19 in the 13-state drafting team, and we want to
20 get to four quarterly releases a year. And we
21 want to adhere by the time lines that we've all
22 agreed to that we all know we can live up to.
23 But we have to have a chance to get to that.
24 And we have to have a chance to get that by not
25 having others throw things in there that haven't

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1 able to comply with all of those requirement and
2 interval periods to date this year is because of
3 regulatory mandates. I think our companies have
4 a different view about that. But I don't know
5 that we need to go into all of that here.

6 MS. FAGAN: I'd like to ask a
7 question. Southwestern Bell, it's my
8 understanding, has had AT&T's proposal and MCI's
9 proposal for -- I don't know. If AT&T's is
10 dated April 6th, then I assume MCI's is fairly
11 the same age. Has Southwestern Bell considered
12 any sort of change management performance
13 measurement?

14 MS. KING: Yeah. I mean, if we
15 want to measure the notification time lines as
16 specified in the change management document that
17 we're going to be living under, hopefully
18 shortly, which would be a 13-state document, but
19 until then, I guess the change management
20 documents that are in place in the various
21 regions. We could do that.

22 You know, I wanted to go on record as
23 saying I don't think it's necessary, because I
24 don't think we've abused the process. I think
25 we've had exception releases. We followed every

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1 single step in the process. The intervals have
2 been shortened, and I guess we're all in
3 disagreement as to why they were shortened based
4 on our positions on the mandates.

5 But, yes, we could live with a
6 variation of either AT&T or MCI's. Primarily I
7 think I would -- I would look at a different
8 benchmark based on what I feel is different
9 between the Bell Atlantic proposal and our --
10 and our change management process, which has
11 quite generous lead times.

12 MR. SRINIVASA: Are you going to
13 discuss this -- discuss these measures tomorrow?

14 MS. BOURIANOFF: I mean, I think
15 if Southwestern Bell could put something on
16 paper so we could actually see it, we'd be glad
17 to discuss it tomorrow.

18 MR. DYSART: I think we could do
19 that. I have a couple comments, not from detail
20 but from what I know something about. The
21 measurement type, we had Tier 1 and Tier 2.
22 Tier 2, I'm not sure I agree with high, but
23 whether it's high, medium or low, Tier 1, this
24 is specific to the industry. It's not specific
25 to an individual CLEC. And we've addressed that

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1 situation in common transport trunk blockage as
2 just a Tier 2. I don't think it's quite
3 appropriate or fair that every CLEC be paid for
4 this measurement. I think it's more applicable
5 in a Tier 2 environment.

6 And the levels of disaggregation, I'm
7 not sure why it needs to be by interface,
8 because you're measuring the notification of the
9 process, and that process, although there may be
10 notifications for EDI, LEX or those, it would
11 seem to me we would have a larger sample if we
12 included all those notifications for all -- as
13 an aggregate for all interfaces versus
14 individual interfaces. And I think we'd
15 captured, then, the change management process
16 when we have more data points.

17 The other -- the other issue I would
18 have with this is a 12-month -- I think you're
19 talking a rolling average. The problem with the
20 rolling average -- which I guess my problem
21 would be, it doesn't look at current
22 performance. You still -- you may be -- perform
23 poorly in the first two months, and then it
24 takes another 11 months to get rid of that first
25 one. So your performance is not as current as

1 what I would like to see it.
2 So I think we'd have to -- I'd be more
3 comfortable with a different approach. It may
4 be that we wait until we get 10 to 12 data
5 points and then we say, okay, we'll -- we'll
6 look at that as a time period. It may be a
7 different time period just based on the number
8 of data points that we've received. I mean, one
9 could do it that way. But I'm concerned about
10 those three issues, I guess, from just a general
11 perspective, which we'll address in our
12 proposal.

13 MS. BOURIANOFF: I mean, with
14 respect to the 12-month rolling average, AT&T is
15 willing to work with Southwestern Bell. I mean,
16 I understand your concern, Randy. Our concern
17 and the reason we've proposed something broader
18 than just a simple one-month look, is that
19 change management is broader, and it has a
20 12-month forward-looking view. But we could
21 discuss that.

22 With regard to the Tier 1 damage issue,
23 maybe there's a way we can compromise that CLECs
24 that are using electronic interfaces could
25 receive some sort of damages, because change

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1 management and the manner in which Southwestern
2 Bell rolls out releases, the testing window
3 allows CLECs and whether they implement
4 emergency releases -- we've had some
5 situations -- AT&T has this spring -- as
6 emergency releases have been rolled out
7 associated with line sharing that have affected,
8 you know -- for a narrow portion of time, that
9 affected the way we use the interfaces. And so
10 it does impact individual CLECs when
11 Southwestern Bell doesn't follow the change
12 management process.

13 MS. KING: Okay. Let me ask --
14 let me ask you a question. On the exception
15 bases that you proposed in yours, that you said
16 you're going to track exception bases, now, the
17 line sharing release was an exceptions release
18 because we did not -- we were not able to
19 provide six months' notification, as we would --
20 as we'd agreed to in change management, because
21 we weren't given that much time. And we were in
22 collaborative meetings with CLECs coming up with
23 the requirements. You know, so it just was
24 impossible. So that went out as an exception
25 release.

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1 In an exception release, the time lines 2 are set by SBC when they send out the initial 3 requirements. And CLECs, unless it's a 4 mandate -- in this case, it was -- CLECs can 5 either approve or disapprove an exception 6 release. It's a request, "Here's something that 7 we can do. Do you guys want to do this in this 8 time frame or not?" And then we get comments 9 back.	1 this may be helpful. In Bell Atlantic, they do 2 classify the notifications by -- I think it's 3 five different categories. There's one set 4 aside for emergencies or regulatory bodies, 5 CLEC-initiated changes, you know, Bell 6 Atlantic-initiated changes. So something like 7 that might be helpful to address those 8 regulatory ones that they can be disaggregated 9 separately from others.	
10 So it's -- it would be very difficult, 11 if not impossible, to manage a release like the 12 527 release, because it was an exception. It 13 didn't follow the time lines in change 14 management. So I don't -- we'd have to exclude 15 exception releases from this measurement.	10 MS. KING: Our change management 11 process actually addresses that. We didn't take 12 the same approach Bell Atlantic did by type of 13 change, but we have it by type of interface, and 14 then we have a section that addresses mandates. 15 And then we have a section that provides for 16 exceptions to the process. And that's on a -- 17 kind of a case-by-case basis.	
16 MS. FETTIG: Well -- this is Eva 17 Fettig from AT&T -- I guess from my perspective, 18 that line sharing order was out some time, and 19 from my perspective, SBC dragged their feet on 20 what they were going to do to comply with the 21 line sharing order for some months. And then 22 once they figured it out, then all of a sudden, 23 it became an emergency. And so I would not use 24 that as an example of something that's -- that 25 is an exception that should not be included.	18 MS. EMCH: Is there any immediate 19 response on the documentation?	
1 MS. FAGAN: I think if the parties 2 could agree to discuss this offline, this 3 evening, tomorrow, in the workshop, and get back 4 to us with a written proposal that comports to 5 the other items we looked at today, agree to; if 6 not agree to, what issues, narrow it down that 7 way, that would be helpful.	20 MS. KING: No. I think the -- it 21 would be fair to require documentation be 22 available on time.	
8 MR. SRINIVASA: One or two 9 questions. If you do not want this -- you know, 10 if the measurement type, if both Tier 1 and Tier 11 2 could be either/or. Right?	23 MS. FAGAN: If we can go ahead and 24 move on to MCI -- you have a second --	
12 MR. DYSART: Well, no. I think it 13 should be Tier 2.	25 MS. McCALL: Can I make a -- Cindy	
14 MS. EMCH: MCI WorldCom's measure 15 that was similar to AT&T's was for notifications 16 and for documentation as well. So we can 17 address that, as well as Southwestern Bell. I'm 18 not sure I understand that -- Catherine, I 19 believe?	Page 314	Page 316
20 MS. KING: Kathy.	1 McCall, WorldCom. Can I make a quick comment 2 about the first measurement that we're 3 proposing? Three quarters of the way down, we 4 have a line there that says the accumulation of 5 a rep's time is based on business days and 6 hours. It's my understanding based on the 7 current change management process that any time 8 interval over five days is measured in calendar 9 days. And so we would suggest that it be 10 calendar days as opposed to business days.	
21 MS. EMCH: Kathy was talking about 22 the notifications where we also would have the 23 same performance measurement for that final 24 documentation being sent to the CLEC.	11 MS. KING: We probably should just 12 refer to the process that's already documented, 13 because some of the notifications are three 14 business days, like a comment period for a GUI, 15 or four business days.	
25 Another point I wanted to make, and	16 MS. McCALL: Right. If the 17 interval is over five days, it's my 18 understanding it's calendar days, not business 19 days.	
	20 MS. KING: But that's spelled out 21 in change management. So, I mean, if you just 22 refer to the change management, we need to 23 follow the process as it's spelled out.	
	24 MS. McCALL: And that's --	
	25 MS. EMCH: And that's what we do	

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1 say in our measure. Just to let you know,
2 Cindy, it does say time frames prescribed by the
3 parties' change management agreement.

4 MS. McCALL: But I was trying to
5 make that point towards the bottom. It might be
6 inconsistent.

7 MS. KING: Okay.

8 MS. EMCH: So we need to delete
9 that from our proposal about the business -- the
10 business hours and go back to the time frames in
11 the agreement, which is fine.

12 MR. SRINIVASA: In PM-123, I
13 believe MCI -- there are two -- when I'm reading
14 it, you know, it starts out with calculation
15 methodology. You're proposing percent software
16 certification failures and percent software
17 problems resolved on time. Do you mean to say
18 that both are in that same PM-123, or are they
19 two different measures?

20 MS. EMCH: Once again -- Marcia
21 with WorldCom -- we were offering these as
22 drafts, and we'd be willing to work with
23 Southwestern Bell. Ideally, yes, we'd like to
24 see, once the change is implemented, how many of
25 those -- you know, what happens for -- how many

1 production, is that 30 days after the release is
2 in production, or are we talking a 30-day test
3 window prior to production?

4 MS. EMCH: It's after. Maybe we
5 didn't word that correctly.

6 MR. DYSART: That's the -- that is
7 on the first one, percent software certification
8 failures, or that's during -- that's the one I
9 want -- first I want clarification on that one.
10 Is that what that's referring to there?

11 MS. EMCH: Oh, I guess --

12 MR. DYSART: Or that's the second
13 one?

14 MS. EMCH: I believe you're right.
15 We tried to do a little bit too much here on one
16 measure. My understanding -- and my colleagues
17 can correct me if I'm wrong -- the first one is
18 the percent software certification failures
19 would be during the testing phase, not post
20 production; whereas, the software problems being
21 resolved on time would be that 30-day period
22 after the testing. I -- thank you, Randy. I
23 apologize. We tried to combine too much there.

24 MR. DYSART: Oh, that's all right.

25 I guess in general comment -- and I'll be very

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1 failures are then causing CLEC harm afterwards;
2 and for those failures that are identified, then
3 how quickly are they restored, resolved. So
4 it's a -- it is a kind of a two-parter, and we'd
5 be willing to work with Southwestern Bell to see
6 if in fact both are needed, which we think are.

7 MR. DYSART: Well, let me see if I
8 can clarify or get some information. You're
9 saying that the second one -- is that during the
10 testing period or after the testing period?

11 MR. SRINIVASA: You mean
12 certification failures? Are you referring to
13 that, or is it software problems resolved on
14 time? There are two measures. It's like the
15 meantime to restore and frequency of failures.

16 MR. DYSART: Well, either one of
17 them. I guess obviously the first part would be
18 during the testing procedure.

19 MS. McCALL: Cindy McCall,
20 WorldCom. It's release implementation testing.

21 MS. EMCH: If you looked in our
22 proposal, like the seventh line down under
23 business rules, during a 30-day period following
24 release to production.

25 MS. KING: Following release to

1 brief -- the first part of it, I sort of have a
2 problem with that measurement, because that
3 testing -- that's what it's for is to catch
4 errors. So being evaluated when we're doing
5 what we're supposed to be doing by catching
6 errors so it doesn't get involved in the final
7 implementation, I have a problem inherently with
8 that. I think the --

9 MS. EMCH: But if the measure
10 wasn't -- if the problem wasn't caught during
11 the testing phase, would you be opposed to
12 having this -- having --

13 MR. DYSART: I'm more open to talk
14 about that one than the first one.

15 MS. McCALL: Cindy McCall,
16 WorldCom. It's my understanding in the change
17 management process, 30 days before the release
18 Southwestern Bell should have finished their
19 testing. Is that not correct?

20 MS. KING: Internal testing should
21 be complete 37 days prior to implementation, and
22 CLEC joint testing begins.

23 MS. McCALL: So if we -- if we --
24 the CLECs do our testing within that 30-day
25 window before the release goes out and other

1 changes are made, then that makes our testing 2 invalid? 3 MS. KING: Other changes are made? 4 MS. McCALL: If -- if other 5 changes are made to the release within that 6 30-day window as we're doing our testing, then 7 our testing is invalid. 8 MR. DYSART: Well, I think 9 invalid -- you mischaracterized that. If you 10 find an error that we correct, then that's what 11 it's for. That's why you have a testing window. 12 Now -- 13 MS. McCALL: The testing window is 14 for the CLEC. 15 MR. DYSART: I understand that. 16 MS. McCALL: Okay. 17 MR. DYSART: But, I mean, if it 18 was perfect, you may not need to test. But 19 testing allows both parties to find -- if 20 there's an error, to find it. If not, then 21 you're kind of validating the accuracy of it. 22 So all I'm saying is this part, I would 23 probably -- am really opposed to. The next part 24 I'd like to address with my colleagues here. 25 But I personally may not be quite as opposed to	Page 321	1 MR. WAKEFIELD: That's correct, 2 because they have a period of time prior to day 3 37 to do their testing to make sure that their 4 side of the interface works. 5 MS. BOURIANOFF: And I just want 6 to point out, day 37 is if the change management 7 process works ideally as it's supposed to. I 8 mean, through the exception process, that 9 testing window for the CLECs can be shortened 10 considerably, and there have been releases over 11 the last year where that testing window has been 12 shortened to, you know, between seven days 13 and -- anywhere between seven days and that 14 37-day period. So if the testing window for 15 CLECs is shortened, the concern that MCI 16 WorldCom is talking about is heightened. Any 17 change that Southwestern Bell might make on the 18 emergency basis or otherwise or any change to 19 the requirements that they might make or to the 20 test deck during that period would really impact 21 the CLEC. 22 MR. SRINIVASA: Okay. This is 23 another PM that you are going to discuss 24 tomorrow. 25 MR. DYSART: Right.	Page 323
1 it. 2 MR. WAKEFIELD: Jason Wakefield, 3 WorldCom. The theory, as I understand it, is 4 that Southwestern Bell would complete its 5 testing by day 37 before the release. And the 6 theory would be that Southwestern Bell's 7 interface would be ready to go. And then the 8 testing window from day 37 until the release 9 date would be to make sure that the CLECs' 10 systems are compatible and work with the new 11 system. 12 So if there's a problem discovered on 13 the Southwestern Bell side on day 15, for 14 example, and Southwestern Bell has to go back 15 and adjust their systems, then you have to start 16 with the process over again, and you'd have to 17 go through the testing process to allow the CLEC 18 to test against the new -- the modified 19 interface. So that's what the first measurement 20 is intended to capture. 21 MR. SRINIVASA: So during that 22 37-day time period when they do their own 23 internal testing, you expect them to be -- when 24 a CLEC goes in there to test, you shouldn't find 25 any problems. Is that your position?	Page 322	1 MR. SRINIVASA: They're addressing 2 a different issue, extending the testing. 3 MR. DYSART: Well, I understand 4 that, but, you know, they also have the go, 5 no-go vote if they don't feel they've had enough 6 time to do testing. But we can talk about that 7 tomorrow, and we'll come up with a proposal. 8 MR. SRINIVASA: Or else it will be 9 in our hands. 10 (Laughter) 11 MR. DYSART: It will be in your 12 hands. Capable hands, I might add. 13 MS. FAGAN: Is there anything 14 further? If there's nothing further, then this 15 concludes the workshop today, and tomorrow I 16 believe an informal work session is scheduled to 17 begin at 9:30 in Hearing Room Gee. And then 18 following on Thursday the 8th, we'll have 19 another workshop. And at that time we'll 20 consider trunking. That will be the first item 21 to be considered that day. And we'll also 22 consider collocation sometime on Thursday. 23 MS. BOURIANOFF: You mean billing? 24 MS. FAGAN: Oh, I'm sorry, 25 billing. That's correct. Trunking and billing.	Page 324

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1 UNIDENTIFIED SPEAKER: Clarifying
2 question. Change management -- or subject to
3 the fact that we're supposed to get a proposal,
4 that won't be taken up in one of these
5 workshops?

6 MS. FAGAN: We'll shoot to have
7 that done on Thursday as well. That would be
8 our miscellaneous day, is Thursday.

9 MR. DYSART: We'll try to capture
10 the issues well enough where we won't go into it
11 an extensive amount of time. We will agree to
12 do that. I hope my colleagues will from the --

13 MR. SRINTVASA: Not only capture,
14 try to resolve.

15 MR. DYSART: We would like to do
16 that to keep it out of your capable hands.

17 MR. SRINTVASA: Thank you.

18 MS. FAGAN: Thank you.

19 (Proceedings concluded at 6:00 p.m.)

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